

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**JENNIFER THOMPSON and CHRISTOPHER DOXEY**  
as Natural Parents and Next Friends of ACD, a minor

**PLAINTIFFS**

**VERSUS**

**CIVIL ACTION NO. 1:22-cv-125-LG-RPM**

**PASS CHRISTIAN PUBLIC SCHOOL DISTRICT;  
JONES COLLEGE, JEDEDIAH “JED” MOONEY,  
Individually, KM, a Minor; CR, a Minor, TC, a Minor,  
MM a Minor, and JOHN or JANE DOES 1-10**

**DEFENDANTS**

**JONES COLLEGE’S MOTION ENTRY OF RULE 54(b) FINAL JUDGMENT**

Jones College (“JC”), by and through counsel and pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, moves this Court for the Entry of a Final Judgment of Dismissal With Prejudice as to all claims against JC. In support thereof, JC would show as follows:

1. On March 20, 2023, this Court entered a Memorandum Opinion and Order dismissing all Plaintiffs’ Federal law claims against JC with prejudice, leaving only state law claims of civil conspiracy, negligence, intentional and negligent infliction of emotional distress, and assault and battery pending against JC.<sup>1</sup>

2. On November 30, 2024, this Court entered a Memorandum Opinion and Order granting JC’s Motion for Summary Judgment on Plaintiff’s remaining state law claims against JC and dismissed JC from this lawsuit with prejudice.<sup>2</sup>

3. JC now seeks the entry of a Final Judgment pursuant to Rule 54(b) as to all claims against it as there is no just reason for the entry of a Final Judgment as to JC pursuant to Rule 54(b) because (1) all claims against JC have been adjudicated and dismissed; (2) Plaintiffs’ claims against JC

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<sup>1</sup> See Document 99.

<sup>2</sup> See Document 317. Additionally, Plaintiffs confessed their civil conspiracy, assault & battery and intentional infliction of emotional distress claims against JC in their responsive Memorandum, leaving only negligence claims for this Court to address in its November 30, 2024 ruling. See Document 208, at p. 15.

are separable from their claims against the other defendants; and (3) JC would suffer hardship and injustice if there is a delay in the entry of a final judgment as to the claims against it.

4. JC incorporates herein by reference its Memorandum in Support of its Motion for Entry of a Final Judgment of Dismissal with Prejudice pursuant to Rule 54(b) filed simultaneously herewith. Based on the nature of the claims against JC as well as the well-established precedent in this jurisdiction, a final judgment of dismissal with prejudice should be entered as to Plaintiffs' claims against JC pursuant to Rule 54(b).

ACCORDINGLY, JC respectfully requests that this Court grant its Motion for Entry of a Final Judgment of Dismissal with Prejudice pursuant to Rule 54(b), find that there is no just reason for delay, and enter a Final Judgment of Dismissal with Prejudice as to all claims against JC. JC further requests all additional relief to which it is entitled, at law or in equity.

RESPECTFULLY SUBMITTED this, the 6<sup>th</sup> day of December, 2024.

JONES COLLEGE

BY: /s/ Matthew D. Miller

MATTHEW D. MILLER

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**CERTIFICATE OF SERVICE**

I, the undersigned, attorney of record for Jones College, do hereby certify that I have this day forwarded a true and correct copy of the above and foregoing document using the Court's ECF Electronic Filing System, and further forwarded a copy of this document via U.S. Mail to the following:

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THIS, the 6<sup>th</sup> day of December, 2024.

/s/ Matthew D. Miller  
MATTHEW D. MILLER